



May 7, 2018

VIA ECF

Honorable Judge Claire C. Cecchi
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

**In Re: Proton-Pump Inhibitor Products Liability Litigation
2:17-md-2789 (CCC)(MF) (MDL 2789)**

Dear Judge Cecchi,

As discussed at the last status conference, Plaintiffs respectfully submit the attached Proposed Case Management Order Regarding Management of Timekeeping, Cost Reimbursement, and Related Common Benefit Issues. As stated at the conference, Defendants' counsel have reviewed and take no position with respect to the proposed Order.

We thank the Court for its time and courtesy, and should the Court have any questions or concerns regarding this submission, please do not hesitate to contact me.

Respectfully submitted,

/s/ Christopher A. Seeger
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On behalf of the Plaintiffs' Steering Committee

cc: All Counsel of Record (via ECF)